### DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

Case No. 1:23-cv-00012-WAL-EAH

LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, PORT HAMILTON REFINING & TRANSPORTATION, WEST INDIES PETROLEUM LTD., and LIMETREE BAY REFINERY, LLC, as a nominal Defendant

Defendants.

## NOTICE OF INTENT TO SERVE SUBPOENAS FOR THE PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 45(a)(4), Defendant Limetree Bay Terminals, LLC d/b/a Ocean Point Terminals, by and through its undersigned counsel, intends to serve Subpoenas to Produce Documents on the parties listed below:

- 1. Alejandro Sardi-Freitez, M.D., 5665 Peachtree Dunwoody Rd., Atlanta, GA 30342;
- 2. Alex Hebert, NP-C, 993 C Johnson Ferry Road, Suite 300, Atlanta, GA 30342;
- 3. Anthony Law, M.D., 550 Peachtree Street NE, Atlanta, GA 30308;
- 4. Ashley Davis, M.D., 4028 Holcomb Bridge Rd., Suite 200. Peachtree Corners, GA 30092;
- 5. Leo Ovadje, M.D., 105 N Park Trail, # 300, Stockbridge, GA 30281;
- 6. Louise Sheffield, M.D., 6825 Jimmy Carter Blvd., Suite #1100, Norcross, GA 30071;
- 7. Muraina Oyekunle, M.D., 560 1st Street, Macon, GA 31201;
- 8. Ria Gripaldo, M.D., 5673 Peachtree Dunwoody Rd., Atlanta, GA 30342;

- 9. Robert Prudent, M.D., 675 Seminole Avenue NE., Suite 305, Atlanta, GA 30307;
- 10. Robin Hardin, M.D., 1325 Satellite Blvd., Building 300, Suite 303, Suwanee, GA 30024;
- 11. Wellstar East Point Health Center, 1170 Cleveland Ave., Suite 100, Atlanta, GA 30344;
- 12. Toral Shah, M.D., 12 Executive Park Drive, Northeast, Atlanta, GA 30329;
- 13. Ziad Kazzi, M.D., 80 Jesse Hill Jr Drive, SE, Atlanta, GA 30303.

True and correct copies of said Subpoenas are attached hereto as Composite Exhibit 1.

DATED: May 22, 2025 Respectfully submitted,

### **AKERMAN LLP**

201 East Las Olas Boulevard, Suite 1800 Fort Lauderdale, Florida 33301 Telephone: (954) 463-2700

Facsimile: (954) 463-2224

### By: /s/ Donnie M. King

**Donnie M. King** 

Virgin Islands No. 1237 donnie.king@akerman.com tyresa.thompson@akerman.com **Eric D. Coleman** (admitted *pro hac vice*) eric.coleman@akerman.com lauren.chang-williams@akerman.com **Reginald E. Janvier** (admitted *pro hac vice*) reginald.janvier@akerman.com sharon.luesang@akerman.com

Counsel for Defendant Ocean Point Terminals f/k/a Limetree Bay Terminals d/b/a Ocean Point Terminals

### **CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed with the Court's electronic filing system on May 22, 2025 which will send a notice of electronic filing to all counsel of record.

/s/ Donnie M. King
Donnie M. King, Esq.

# Composite Exhibit 1

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

### United States District Court

District of the Virgin Islands

NICOLE WOOTEN

Plaintiff

LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al.

Defendant

Defendant

| Output | Defendant | District of the Virgin Islands | Terminals |

### SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

	0	R TO PERMIT INSPECTION OF PR	EMISES IN A CI	VIL ACTION
To:	Alejandro Sardi-Fr 5665 Peachtree D	reitez, M.D. Junwoody Rd., Atlanta, GA 30342		
		(Name of person to whom the	nis subpoena is directe	d)
docu mate	ments, electronical	<b>DU ARE COMMANDED</b> to produce at a ly stored information, or objects, and to p	the time, date, and permit inspection, of	place set forth below the following copying, testing, or sampling of the
	Please see Exh	ibit A attached hereto.		
Plac		kkerman LLP, 201 East Las Olas Blvd., auderdale, FL 33301; or via email at rman.com	Date and Time:	06/10/2025 at 10:00 a.m.
other	property possessed	remises: YOU ARE COMMANDED to d or controlled by you at the time, date, a urvey, photograph, test, or sample the pro-	nd location set fort	th below, so that the requesting party
Plac	ce:		Date and Time:	
	45(d), relating to your to this subpoens	provisions of Fed. R. Civ. P. 45 are attach our protection as a person subject to a su a and the potential consequences of not d	bpoena; and Rule	
		CLERK OF COURT		
		CEEIN OF COOK	OR	
				/s/Donnie M. King
		Signature of Clerk or Deputy Clerk		Attorney's signature
The 1	name, address, e-ma	ail address, and telephone number of the	attorney representi	ing (name of party) Defendant

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

Limetree Bay Terminals d/b/a Ocean Point Terminals

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

, who issues or requests this subpoena, are:

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	ppoena for (name of individual and title, if a	ny)			
ate)	·				
☐ I served the su	bpoena by delivering a copy to the na	ering a copy to the named person as follows:			
		on (date) ;	or		
☐ I returned the s	subpoena unexecuted because:				
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the			
		for services, for a total of \$	0.00		
I declare under pe	enalty of perjury that this information	is true.			
		Server's signature			
		Server a signature			
		Printed name and title			
		Server's address			

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
- \*Medication records
- \*Lab tests/reports/HIV test results
- \*Insurance Claims
- \*Therapy Records (P.T., O.T., etc.)
- \*Videotapes
- \*Bills
- \*Discharge Summaries
- \*Radiology reports
- \*MRI reports
- \*CT reports
- \*Psychiatric records

- \*Correspondence
- \*Memoranda
- \*Counseling records/reports
- \*Hospital admission records
- \*Out-patient records
- \*Prescriptions
- \*Rehabilitation records
- \*Pathology reports
- \*Statements and bills
- \*Disability statements
- \*Workers Compensation claims
- \*Records from other health care providers
- \*Operative Reports
- \*EMS reports
- \*Consents
- \*Radiology films
- \*MRI films and scans
- \*CT films and scans
- \*Substance Abuse records

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AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

### United States District Court

for the
District of the Virgin Islands

District of t			
NICOLE WOOTEN	)		
Plaintiff  V LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al.	) ) )	Civil Action No.	1:23-cv-00012-WAL-EAH
Defendant	)		

### SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

То:	Alex Hebert, NP-C
10:	993 C Johnson Ferry Road, Suite 300, Atlanta, GA 30342

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

(Name of person to whom this subpoena is directed)

Please see Exhibit A attached hereto.

	kerman LLP, 201 East Las Olas Blvd., auderdale, FL 33301; or via email at man.com	Date and Time:	06/10/2025 at 10:00 a.m.
other property possessed	temises: YOU ARE COMMANDED to do or controlled by you at the time, date, a curvey, photograph, test, or sample the pr	nd location set fort	th below, so that the requesting party
Place:		Date and Time:	
Rule 45(d), relating to y	rovisions of Fed. R. Civ. P. 45 are attack our protection as a person subject to a su a and the potential consequences of not of	bpoena; and Rule	
Date:05/22/2025	_		
	CLERK OF COURT		
		OR	/s/Donnie M. King
	Signature of Clerk or Deputy Clerk		Attorney's signature
The name, address, e-ma	ail address, and telephone number of the	attorney representi	ing (name of party) Defendant
Limetree Bay Terminals	d/b/a Ocean Point Terminals	, who issu	ues or requests this subpoena, are:

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

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AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

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	ppoena for (name of individual and title, if a	ny)			
ate)	·				
☐ I served the su	bpoena by delivering a copy to the na	ering a copy to the named person as follows:			
		on (date) ;	or		
☐ I returned the s	subpoena unexecuted because:				
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the			
		for services, for a total of \$	0.00		
I declare under pe	enalty of perjury that this information	is true.			
		Server's signature			
		Server a signature			
		Printed name and title			
		Server's address			

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

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- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

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- \*Medication records
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- \*Insurance Claims
- \*Therapy Records (P.T., O.T., etc.)
- \*Videotapes
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- \*MRI reports
- \*CT reports
- \*Psychiatric records

- \*Correspondence
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- \*Counseling records/reports
- \*Hospital admission records
- \*Out-patient records
- \*Prescriptions
- \*Rehabilitation records
- \*Pathology reports
- \*Statements and bills
- \*Disability statements
- \*Workers Compensation claims
- \*Records from other health care providers
- \*Operative Reports
- \*EMS reports
- \*Consents
- \*Radiology films
- \*MRI films and scans
- \*CT films and scans
- \*Substance Abuse records

Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 13 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States District Court for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Anthony Law, M.D. To: 550 Peachtree Street NE, Atlanta, GA 30308 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. 05/22/2025 Date: CLERK OF COURT OR

Limetree Bay Terminals d/b/a Ocean Point Terminals , who issues or requests this subpoena, are:

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Defendant

/s/Donnie M. King

Attorney's signature

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

Signature of Clerk or Deputy Clerk

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	ppoena for (name of individual and title, if a	ny)			
ate)	·				
☐ I served the su	bpoena by delivering a copy to the na	ering a copy to the named person as follows:			
		on (date) ;	or		
☐ I returned the s	subpoena unexecuted because:				
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the			
		for services, for a total of \$	0.00		
I declare under pe	enalty of perjury that this information	is true.			
		Server's signature			
		Server a signature			
		Printed name and title			
		Server's address			

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
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- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
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- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
- \*Medication records
- \*Lab tests/reports/HIV test results
- \*Insurance Claims
- \*Therapy Records (P.T., O.T., etc.)
- \*Videotapes
- \*Bills
- \*Discharge Summaries
- \*Radiology reports
- \*MRI reports
- \*CT reports
- \*Psychiatric records

- \*Correspondence
- \*Memoranda
- \*Counseling records/reports
- \*Hospital admission records
- \*Out-patient records
- \*Prescriptions
- \*Rehabilitation records
- \*Pathology reports
- \*Statements and bills
- \*Disability statements
- \*Workers Compensation claims
- \*Records from other health care providers
- \*Operative Reports
- \*EMS reports
- \*Consents
- \*Radiology films
- \*MRI films and scans
- \*CT films and scans
- \*Substance Abuse records

Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 17 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

### UNITED STATES DISTRICT COURT for the

District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant

### SURPOENA TO PRODUCE DOCUMENTS INFORMATION OR ORIECTS

To: Ashley Davis, MI 4028 Holcomb B	) ridge Rd., Suite 200, Peachtree Corners,	GA 30092
	(Name of person to whon	n this subpoena is directed)
documents, electronica material:	<b>YOU ARE COMMANDED</b> to produce a ally stored information, or objects, and to whibit A attached hereto.	at the time, date, and place set forth below the following opermit inspection, copying, testing, or sampling of the
	Akerman LLP, 201 East Las Olas Blvd., Lauderdale, FL 33301; or via email at	Date and Time: 06/10/2025 at 10:00 a.m.
donnie.king@ak	kerman.com	
donnie.king@ak  Inspection of I  other property possess	Premises: YOU ARE COMMANDED to ed or controlled by you at the time, date,	to permit entry onto the designated premises, land, or and location set forth below, so that the requesting party property or any designated object or operation on it.  Date and Time:
donnie.king@ak  Inspection of a other property possess may inspect, measure,  Place:  The following Rule 45(d), relating to	Premises: YOU ARE COMMANDED and or controlled by you at the time, date, survey, photograph, test, or sample the provisions of Fed. R. Civ. P. 45 are atta	and location set forth below, so that the requesting party property or any designated object or operation on it.  Date and Time:  ched – Rule 45(c), relating to the place of compliance; subpoena; and Rule 45(e) and (g), relating to your duty to
Inspection of other property possess may inspect, measure,  Place:  The following Rule 45(d), relating to respond to this subpoerty.	Premises: YOU ARE COMMANDED and or controlled by you at the time, date, survey, photograph, test, or sample the provisions of Fed. R. Civ. P. 45 are attangour protection as a person subject to a signal and the potential consequences of not	and location set forth below, so that the requesting party property or any designated object or operation on it.  Date and Time:  ched – Rule 45(c), relating to the place of compliance; subpoena; and Rule 45(e) and (g), relating to your duty to

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	ppoena for (name of individual and title, if a	ny)			
ate)	·				
☐ I served the su	bpoena by delivering a copy to the na	ering a copy to the named person as follows:			
		on (date) ;	or		
☐ I returned the s	subpoena unexecuted because:				
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the			
		for services, for a total of \$	0.00		
I declare under pe	enalty of perjury that this information	is true.			
		Server's signature			
		Server a signature			
		Printed name and title			
		Server's address			

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
- \*Medication records
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- \*EMS reports
- \*Consents
- \*Radiology films
- \*MRI films and scans
- \*CT films and scans
- \*Substance Abuse records

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

### UNITED STATES DISTRICT COURT

for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Leo Ovadje, M.D. To: 105 N Park Trail, # 300, Stockbridge, GA 30281 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party

other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

	The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance;
	The following provisions of Fed. R. Civ. F. 43 are attached – Rule 43(c), relating to the place of comphance,
1	D. 1. 45(4)

Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date:	05/22/2025			
		CLERK OF COURT	0.0	
			OR	
				/s/Donnie M. King
		Signature of Clerk or Deputy Clerk		Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Limetree Bay Terminals d/b/a Ocean Point Terminals

, who issues or requests this subpoena, are:

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

05/00/0005

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	opoena for (name of individual and title, if an	ny)		
nte)	·			
☐ I served the sul	bpoena by delivering a copy to the nar	med person as follows:		
	on (date) ; o		or	
☐ I returned the s	subpoena unexecuted because:			
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the		
es are \$	for travel and \$	for services, for a total of \$	0.00	
I declare under pe	nalty of perjury that this information i	s true.		
		Server's signature		
		Printed name and title		

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
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### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

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### (g) Contempt.

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- \*Orders
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- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
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- \*Pathology reports
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- \*Disability statements
- \*Workers Compensation claims
- \*Records from other health care providers
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Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 25 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

### UNITED STATES DISTRICT COURT

TERMINALS, et al.

District of the Virgin Islands

NICOLE WOOTEN

Plaintiff

Civil Action No.

Civil Action No.

1:23-cv-00012-WAL-EAH

Defendant

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Louise Sheffield, M.D. To: 6825 Jimmy Carter Blvd., Suite #1100, Norcross, GA 30071 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. 05/22/2025 Date: CLERK OF COURT OR /s/Donnie M. King Signature of Clerk or Deputy Clerk Attorney's signature

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

Limetree Bay Terminals d/b/a Ocean Point Terminals

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

Defendant

, who issues or requests this subpoena, are:

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	poena for (name of individual and title, if a		
ate)	·		
☐ I served the sul	opoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	ubpoena unexecuted because:		
	tness the fees for one day's attendance	I States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Berver B signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
- \*Medication records
- \*Lab tests/reports/HIV test results
- \*Insurance Claims
- \*Therapy Records (P.T., O.T., etc.)
- \*Videotapes
- \*Bills
- \*Discharge Summaries
- \*Radiology reports
- \*MRI reports
- \*CT reports
- \*Psychiatric records

- \*Correspondence
- \*Memoranda
- \*Counseling records/reports
- \*Hospital admission records
- \*Out-patient records
- \*Prescriptions
- \*Rehabilitation records
- \*Pathology reports
- \*Statements and bills
- \*Disability statements
- \*Workers Compensation claims
- \*Records from other health care providers
- \*Operative Reports
- \*EMS reports
- \*Consents
- \*Radiology films
- \*MRI films and scans
- \*CT films and scans
- \*Substance Abuse records

Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 29 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States District Court for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Muraina Oyekunle, M.D. To: 560 1st Street, Macon, GA 31201 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. 05/22/2025 Date: CLERK OF COURT

Signature of Clerk or Deputy Clerk

Limetree Bay Terminals d/b/a Ocean Point Terminals

Defendant The name, address, e-mail address, and telephone number of the attorney representing (name of party) , who issues or requests this subpoena, are:

/s/Donnie M. King

Attorney's signature

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

OR

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	poena for (name of individual and title, if a		
ate)	·		
☐ I served the sul	opoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	ubpoena unexecuted because:		
	tness the fees for one day's attendance	I States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Berver B signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

### (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
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- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
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### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
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- \*Operative Reports
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- \*MRI films and scans
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Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 33 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

United States District Court for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Ria Gripaldo, M.D. To: 5673 Peachtree Dunwoody Rd., Atlanta, GA 30342 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Place: Date and Time: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance;

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/22/2025

CLERK OF COURT

OR

/s/Donnie M. King

Signature of Clerk or Deputy Clerk

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Defendant

, who issues or requests this subpoena, are:

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

Limetree Bay Terminals d/b/a Ocean Point Terminals

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:23-cv-00012-WAL-EAH

### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	poena for (name of individual and title, if a		
ate)	·		
☐ I served the sul	opoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	ubpoena unexecuted because:		
	tness the fees for one day's attendance	I States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Berver B signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

### (c) Place of Compliance.

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- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
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- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

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- \*Orders
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Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 37 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

# UNITED STATES DISTRICT COURT

for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Robert Prudent, M.D. To: 675 Seminole Avenue NE., Suite 305, Atlanta, GA 30307 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party

may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_ Defendant \_\_\_\_\_ , who issues or requests this subpoena, are:

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:23-cv-00012-WAL-EAH

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(data)	bpoena for (name of individual and title, if an				
	<u> </u>				
☐ I served the subpoena by delivering a copy to the named person as follows:					
		on (date) ;	or		
	subpoena unexecuted because:				
		States, or one of its officers or agents, I e, and the mileage allowed by law, in the			
\$	·				
fees are \$	for travel and \$	for services, for a total of \$	0.00		
I declare under po	enalty of perjury that this information is	s true.			
e:		Server's signature			
		Printed name and title			
		Server's address			

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

# (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

# (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
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#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
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- \*MRI films and scans
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- \*Substance Abuse records

Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 41 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

# UNITED STATES DISTRICT COURT

	for the	_	
	District of the Virg	in Islands	
NICOLE WO	OOTEN		
Plaint	of the second of		4:02 av 00042 WAL FALL
LIMETREE BAY TERMINAL TERMINAL	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Civil Action No.	1:23-cv-00012-WAL-EAH
Defende	unt )		
	NA TO PRODUCE DOCUMENT O PERMIT INSPECTION OF PI		
To: Robin Hardin, M.D. 1325 Satellite Blvd., B	uilding 300, Suite 303, Suwanee, G	GA 30024	
	(Name of person to whom	this subpoena is directe	ed)
documents, electronically sto material:  Please see Exhibit A	red information, or objects, and to	t the time, date, and permit inspection, o	place set forth below the following copying, testing, or sampling of the
	an LLP, 201 East Las Olas Blvd., dale, FL 33301; or via email at com	Date and Time:	06/10/2025 at 10:00 a.m.
other property possessed or c	es: YOU ARE COMMANDED to ontrolled by you at the time, date, photograph, test, or sample the p	and location set for	th below, so that the requesting party
Place:		Date and Time:	
Rule 45(d), relating to your p	ions of Fed. R. Civ. P. 45 are attac rotection as a person subject to a s the potential consequences of not	ubpoena; and Rule	elating to the place of compliance; 45(e) and (g), relating to your duty to
CL	ERK OF COURT	0.77	
		OR	/s/Donnie M. King
	Signature of Clerk or Deputy Clerk		Attorney's signature
The name, address, e-mail ad	dress, and telephone number of the	e attorney represent	ing (name of party) Defendant

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

Limetree Bay Terminals d/b/a Ocean Point Terminals

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Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

, who issues or requests this subpoena, are:

Civil Action No. 1:23-cv-00012-WAL-EAH

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this sub	poena for (name of individual and title, if a	my)	
nte)	·		
☐ I served the sub	opoena by delivering a copy to the nar	med person as follows:	
		on (date) ;	or
☐ I returned the s	ubpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
es are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information i	is true.	
		Server's signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

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AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

# United States District Court

for the
District of the Virgin Islands

Output

District of the Virgin Islands

Plaintiff

V.

LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al.

Defendant

NICOLE WOOTEN

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Wellstar East Point Health Center 1170 Cleveland Ave., Suite 100, Atlanta, GA 30344

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

Please see Exhibit A attached hereto.

Limetree Bay Terminals d/b/a Ocean Point Terminals

	kerman LLP, 201 East Las Olas Blvd.,	Date and Time:	
Suite 1800, Fort La donnie.king@aker	auderdale, FL 33301; or via email at man.com	C	06/10/2025 at 10:00 a.m.
other property possessed	emises: YOU ARE COMMANDED to a lor controlled by you at the time, date, an arvey, photograph, test, or sample the pro-	nd location set forth	below, so that the requesting party
Place:		Date and Time:	
Rule 45(d), relating to yo	rovisions of Fed. R. Civ. P. 45 are attached pur protection as a person subject to a subject and the potential consequences of not declar and the CLERK OF COURT	ppoena; and Rule 45	(e) and (g), relating to your duty to
	C. CCL L D CL L		/s/Donnie M. King
	Signature of Clerk or Deputy Clerk		Attorney's signature
The name, address, e-ma	ail address, and telephone number of the	nttorney representing	(name of party) Defendant

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

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Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

, who issues or requests this subpoena, are:

Civil Action No. 1:23-cv-00012-WAL-EAH

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	ppoena for (name of individual and title, if a	ny)	
ate)	·		
☐ I served the su	bpoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	subpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Server's signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

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Case: 1:23-cv-00012-WAL-EAH Document #: 147 Filed: 05/22/25 Page 49 of 56

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

# UNITED STATES DISTRICT COURT

for the District of the Virgin Islands NICOLE WOOTEN Plaintiff Civil Action No. 1:23-cv-00012-WAL-EAH LIMETREE BAY TERMINALS d/b/a OCEAN POINT TERMINALS, et al. Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Toral Shah, M.D. To: 12 Executive Park Drive, Northeast, Atlanta, GA 30329 (Name of person to whom this subpoena is directed) \*\*Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Please see Exhibit A attached hereto. Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Date and Time: Suite 1800, Fort Lauderdale, FL 33301; or via email at 06/10/2025 at 10:00 a.m. donnie.king@akerman.com ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or

☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

respond	to this subpoens	a and the potential consequences of not do	ing so.		
Date: _	05/22/2025	_			
		CLERK OF COURT			
			OR		
				/s/Donnie M.	King
		Signature of Clerk or Deputy Clerk		Attorney's sign	ature
The nan	ne, address, e-ma	ail address, and telephone number of the a	ttorney rep	resenting (name of party)	Defendant
Limetree	Bay Terminals	d/b/a Ocean Point Terminals	, w	ho issues or requests this	subpoena, are:

Telephone: (954) 463-2700 Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft. Lauderdale, FL 33301; donnie.king@akerman.com,

Civil Action No. 1:23-cv-00012-WAL-EAH

# PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	ppoena for (name of individual and title, if a	ny)	
ate)	·		
☐ I served the su	bpoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	subpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Server's signature	
		Printed name and title	
		Server's address	

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action(Page 3)

# Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

#### (2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
  - (B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

# (2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

# (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
  - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
  - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
  - (ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
  - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- **(B)** Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

#### (g) Contempt.

- \*Reports
- \*Orders
- \*Patient History Questionnaires
- \*Summaries
- \*Handwritten & typewritten notes
- \*Charts
- \*Consultation Reports
- \*Flight and/or transport records
- \*Medication records
- \*Lab tests/reports/HIV test results
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- \*CT reports
- \*Psychiatric records

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- \*Workers Compensation claims
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- \*EMS reports
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# UNITED STATES DISTRICT COURT

TERMINALS, et al.

District of the Virgin Islands

NICOLE WOOTEN

Plaintiff

Civil Action No. 1:23-cv-00012-WAL-EAH

| Defendant | Defend

# SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

OR TO PERMIT INSPECTION OF PRI	EMISES IN A CIVIL ACTION	
To: Ziad Kazzi, M.D. 80 Jesse Hill Jr Drive, SE, Atlanta, GA 30303		
(Name of person to whom th	nis subpoena is directed)	
**Production: YOU ARE COMMANDED to produce at to documents, electronically stored information, or objects, and to p material:  Please see Exhibit A attached hereto.		
Place: Donnie M. King, Akerman LLP, 201 East Las Olas Blvd., Suite 1800, Fort Lauderdale, FL 33301; or via email at donnie.king@akerman.com	Date and Time: 06/10/2025 at 10:00 a.m.	
☐ Inspection of Premises: YOU ARE COMMANDED to pother property possessed or controlled by you at the time, date, and may inspect, measure, survey, photograph, test, or sample the pro-	nd location set forth below, so that the requesting	g party
Place:	Date and Time:	
The following provisions of Fed. R. Civ. P. 45 are attached Rule 45(d), relating to your protection as a person subject to a subject to this subpoena and the potential consequences of not do Date:  05/22/2025	bpoena; and Rule 45(e) and (g), relating to your	
CLERK OF COURT	OR	
	/s/Donnie M. King	
Signature of Clerk or Deputy Clerk	Attorney's signature	
The name, address, e-mail address, and telephone number of the a timetree Bay Terminals d/b/a Ocean Point Terminals	attorney representing (name of party) Defence, who issues or requests this subpoena,	
Donnie M. King, Akerman LLP, 201 E. Las Olas Blvd., #1800, Ft.		
Telephone: (954) 463-2700 Notice to the person who issues o		

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	ppoena for (name of individual and title, if a	ny)	
ate)	·		
☐ I served the su	bpoena by delivering a copy to the na	med person as follows:	
		on (date) ;	or
☐ I returned the s	subpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information	is true.	
		Server's signature	
		Server's signature	
		Printed name and title	
		Server's address	

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